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September 22, 2009

Mr. Andrew McGilvray
Executive Secretary
Foreign-Trade Zones Board
U.S. Department of Commerce
Room 2111
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Re: Request for Extension of Time To Submit Comments; Docket Nos.
20-2009 and 22-2009; Foreign-Trade Zones 29 and 203; Applications for
Subzone Authority; Dow Corning Corporation and REC Silicon

Dear Mr. McGilvray:

On behalf of Globe Metallurgical Inc. ("Globe") and for the reasons set forth below, we request that the Foreign-Trade Zones Board (the "Board") extend the deadline for submitting comments on the above-referenced applications by three weeks until October 21, 2009. The current deadline is September 30, 2009.

The Board held a combined public hearing on these two subzone applications at which eight parties appeared. The Board then established a single deadline for the submission of comments on both applications. As a result, Globe must prepare simultaneously comments on two subzone applications, and in doing so, must take into account hearing statements made by multiple parties regarding the issues raised by the applications. Both applications raise the same fundamental policy issue regarding whether the Board should approve subzone applications that are designed to avoid the payment of antidumping or countervailing duties on imported inputs used to produce merchandise for export. However, they also raise factual issues and arguments related to the specific circumstances of each applicant. Globe needs additional time to be able to address all of these factual and legal claims, as well as the policy arguments raised by the applications and presented at the hearing.

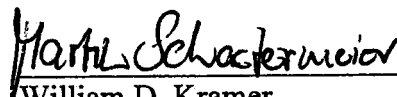
Additional time also is needed due to conflicting work requirements of counsel for Globe. Since the hearing, counsel for Globe have prepared and filed a rebuttal brief and prepared for and participated in a hearing in an antidumping duty administrative review before the Department of Commerce. In addition, counsel for Globe have prepared and filed a submission initiating a prior disclosure with U.S. Customs and Border Protection ("CBP") and have prepared for and participated in an audit conducted by CBP.

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Granting the requested additional time will allow Globe to prepare and present a more complete statement of its factual and legal arguments for consideration by the Board in making its decisions on these applications.

For these reasons, we respectfully request that the Board extend the deadline for submitting comments until October 21, 2009.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Martin Schaefermeier", is written over a horizontal line.

William D. Kramer
Martin Schaefermeier
DLA Piper LLP (US)
500 Eighth Street, N.W.
Washington, D.C. 20004

Counsel for Globe Metallurgical Inc.

cc: Elizabeth Whiteman